

# **Cal/EPA and DTSC's Response to Oakland City Fire Department CUPA Deficiency Progress Report (Update 4) (Submitted January 9, 2008)**

**Date of Evaluation:** August 16, 2006

**Deficiency 1:** Previously Corrected.

**Deficiency 2:** Previously Correct.

**Deficiency 3:** Cal/EPA and DTSC feel the Oakland City Fire Department has adequately corrected this deficiency. However, Cal/EPA and DTSC feel the inspection reports submitted to Cal/EPA should have included more details.

- Telegraph Arco Inspection Report:
  - more information was needed to support the 3 60-gallon drums as a violation (pictures?, leaking? date of accumulation? contain hazardous waste? what do the labels say? where is the rust located on the drum?, etc.)
  - in violation #2 that required new labels and needed to be covered: the report says this violation was corrected during the inspection. Given that there were 2 drums under this violation and the violation was corrected immediately, this is a minor violation that needs to be identified as an observation in the inspection report. Minor violations corrected in the field are not considered violations, but documented as observations in the inspection report.
- Norman's Auto Inspection Report:
  - unable to clearly read the inspector's writing? DTSC had difficulty reading his comments.
  - from what DTSC could read, it appears the HW violations are minor ones. Again, the report should have identified them as minor and it should also have said they have 30 days to come into compliance.
- D&J International Inspection Report:
  - same inspector as above and difficulty reading his writing
  - 1 55-gallon drum identified as "in poor condition @ back". What does in poor condition mean? What did it contain? labeled? closed?
  - "clean up all discharges - ID and proper dispose all..." What is the nature of the discharges? Are they HW? Amount of discharge? Was their contingency plan activated?
  - "Obstructed aisles." Is this a HW violation?
  - the inspection report says there was a cease and desist order issued to this site so the inspector should have put more effort into describing the nature of the violations in detail.

Inspection reports should be legible, should clearly identify a violation as a HW violation, and the violations should be thoroughly described.